

TITLE V COMPLIANCE TRAINING

WORKSHOP MANUAL

**Stationary Source Program
Air Quality Division
Idaho Department of Environmental Quality
May 2003**

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TIER I MONITORING REPORTS



Deviations and Prompt Reporting

- **Basis: IDAPA 58.01.01.322.08.b**
 - **Which states:** *“Prompt reporting of deviations from permit requirements including, but not limited to, those attributable to excess emissions. If the deviation is an excess emission, the report shall be submitted in accordance with Sections 130-136. For all other deviations, the report shall be submitted in accordance with Subsection 322.08.c unless the permit specifies another timeframe. The reports shall describe the probable cause of such deviation and any corrective actions or preventative measures taken.”*



What is a Deviation?

- **Deviation from permit requirements**
 - Any situation in which an emissions unit fails to meet a permit term or condition
 - Emissions control device does not meet a required operating condition
 - Observations or collected data that demonstrate noncompliance with an emissions standard
 - Failure to comply with a permit term that requires a report



What Does Prompt Mean?

- **If deviation is an excess emissions event as defined in Sections 130-136, prompt means reporting pursuant to Sections 130-136**
- **Permit requirement (or underlying applicable requirement) specifies reporting frequency, if more frequent than semiannually**
- **If permit does not specify monitoring reporting frequency, submit reporting at least every six months**



Monitoring Reports

- **Basis: IDAPA 58.01.01.322.08.c**
 - **Which states:** “...Submittal of reports for any required monitoring at least every six (6) months. All instances of deviations from Tier I operating permit requirements, which include monitoring, recordkeeping, and reporting, must be clearly identified in such reports. ...”
- **Incorporated into Tier I General Provisions - see General Provisions 24 & 25**



Semiannual Monitoring Report Content

- **What monitoring data should be provided?**
 - Status of monitoring
 - | Do not submit data unless DEQ specifically requests
 - Details on deviations, causes, corrective actions, and preventative measures
 - Need not include bona fide upsets, malfunctions, or deviations previously reported per Sections 130-136



Semiannual Monitoring Report Forms

- **Standard DEQ forms developed**
 - ♣ Tier I Semiannual Report, [AQ-C4](#)
 - ♣ Semiannual Monitoring Table, [AQ-C5](#)
- **Submit completed forms to comply with permit and rules**



Semiannual Deviation Reports

- **Basis: IDAPA 58.01.01.322.08.c**
 - **Which states:** *“Submittal of reports for any required monitoring at least every six (6) months. All instances of deviations from Tier I operating permit requirements, which include monitoring, recordkeeping, and reporting, must be clearly identified in such reports. All required reports must be certified.”*



Deviation Form

- **Standard DEQ form developed**
 - ♣ Tier I Deviation Summary Table, [AQ-C3](#)



Deviation Reports

- **Basis: IDAPA 58.01.01.322.08.b**
 - **Which states:** *“Prompt reporting of deviations from permit requirements including, but not limited to, those attributable to excess emissions. If the deviation is an excess emission, the report shall be submitted in accordance with Sections 130-136. For all other deviations, the report shall be submitted in accordance with Subsection 322.08.c unless the permit specifies another timeframe. The reports shall describe the probable cause of such deviation and any corrective actions or preventative measures taken.”*



Section 130-136 Deviations

- **Deviation from startup, shutdown, maintenance, safety measures, upset, and breakdown**
 - Reported promptly under Sections 130-136
 - Not itemized on Semiannual Deviation Form (AQ-C3)
 - Listed in the Annual Compliance Certification Table (AQ-C2)



Deviation Other Than Section 130-136 Deviation

- **List on Semiannual Deviation Form
(AQ-C3)**
- **List on Annual Compliance Certification Table
(AQ-C2)**

Excerpt from IDAPA 58.01.01.
Re: Semiannual Reports

IDAPA 58.01.01.322:

08. Reporting. All Tier I operating permits shall incorporate by reference all applicable requirements regarding reporting and require all of the following: (5-1-94)

a. Sufficient reporting to assure compliance with all of the terms and conditions of the Tier I operating permit. (5-1-94)

b. Prompt reporting of deviations from permit requirements including, but not limited to, those attributable to excess emissions. If the deviation is an excess emission, the report shall be submitted in accordance with the requirements of Sections 130 through 136. For all other deviations, the report shall be submitted in accordance with Subsection 322.08.c. unless the permit specifies another time frame. The reports shall describe the probable cause of such deviations and any corrective actions or preventative measures taken. (3-23-98)

c. Submittal of reports for any required monitoring at least every six (6) months. All instances of deviations from Tier I operating permit requirements, which include monitoring, recordkeeping, and reporting, must be clearly identified in such reports. All required reports must be certified in accordance with Section 123. (4-5-00)

Example of Tier I Operating Permit General Provision
Re: Semiannual Reports

Semiannual Monitoring Reports

24. In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six (6) months starting six (6) months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.

[IDAPA 58.01.01.322.15.q, 3/23/98;
IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

25. The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

TIER I SEMIANNUAL REPORT

FORM AQ-C4

FACILITY INFORMATION

Facility/Permittee Name: _____
Co-Permittee Name(s): _____
Facility Location: _____
AIRS Facility No.: _____
Facility Contact: _____ Ph: _____ Fax: _____

PERMIT AND COMPLIANCE INFORMATION

Tier I Operating Permit No.: _____ Issuance Date: _____
Tier I Operating Permit No.: _____ Issuance Date: _____
Compliance Reporting Period: From: _____ To: _____
Deviations Reported This Period? ☐ Yes ☐ No

List of Attachments: ☐ Semiannual Monitoring Table (Form AQ-C5) No. of Pages: _____
☐ Semiannual Deviation Summary Table (Form AQ-C3) No. of Pages: _____
☐ Other: _____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____
_____ No. of Pages: _____

Certification of Truth, Accuracy, and Completeness (by Responsible Official)

I hereby certify that based on information and belief formed after reasonable inquiry, the statements and information contained in this and any attached and/or referenced document(s) are true, accurate, and complete in accordance with IDAPA 58.01.01.123-124.

Responsible Official Signature Responsible Official Title Date

Print or Type Responsible Official Name

Co-Permittee Responsible Official Signature Co-Permittee Responsible Official Title Date

Print or Type Co-Permittee Responsible Official Name

INSTRUCTIONS FOR TIER I SEMIANNUAL REPORT

FORM AQ-C4

In accordance with IDAPA 58.01.01.322.08.b and c, compliance with Tier I operating permits requires submittal of a Semiannual Report. The permittee may comply with these requirements by submitting completed copies of this Semiannual Report (Form AQ-C4), the Semiannual Monitoring Table (Form AQ-C5), and the Semiannual Deviation Summary Table (Form AQ-C3) to the Department. As the Annual Compliance Certification (Form AC-C1) and the Annual Compliance Certification Table (Form AQ-C2) incorporate the reporting requirements of the Semiannual Report (in accordance with IDAPA 58.01.01.322.08), a separate submittal of a Semiannual Report (Form AQ-C4) is not required when the Annual Compliance Certification is due.

Facility Information:

Enter the facility-specific information as indicated at the top of the form.

Permit and Compliance Information:

Tier I Operating Permit No. and Issuance Date:

Enter the permit no. and issuance date as it appears on the issued Tier I operating permit. If there was another Tier I operating permit in effect during the reporting period (a permit could have been modified during the reporting period), insert the additional permit information on the second line.

Compliance Reporting Period:

Enter the time period which is addressed by this Semiannual Report (e.g., January 10, 2003 to July 9, 2003).

Deviations Reported this Period:

Check either yes or no to indicate if any deviations from permit conditions are being reported for the given reporting period. If the answer is yes, attach the Semiannual Deviation Summary Table (Form AQ-C3) to this Semiannual Report.

List of Attachments:

Check the box for each attachment included with this certification. If additional information has been included to supplement the required Tables, please check the "Other" box. Include a title for each attachment provided and indicate the number of pages each attachment contains.

Responsible Official Certification:

The responsible official must sign a certification of truth, accuracy, and completeness for a Semiannual Report. Without this certification, the Semiannual Report does not meet the requirements of IDAPA 58.01.01.123, 322.08.c or 322.15.q. Note that the Co-Permittee Responsible Official signature applies only to the U.S. Department of Energy (INEEL).

A responsible official can be any of the following:

- For a corporation: the president, secretary, treasurer, or vice-president.
- For a partnership or sole proprietorship: the general partner or the proprietor.
- For a municipality, state, federal, or other public agency: the principal executive officer or ranking elected official.

[IDAPA 58.01.01.006.86]

Please note that:

1. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under any permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125]
2. No person shall knowingly render inaccurate any monitoring device or method required under any permit, or any applicable rule or order pursuant thereto.
[IDAPA 58.01.01.126]

Mailing Instructions:

Submit the completed Semiannual Report to the DEQ Regional Office listed in the facility-wide section of your Tier I Operating Permit. Be sure to also include copies of the Tables and all attachments.

TIER I SEMIANNUAL MONITORING TABLE

FORM AQ-C5

Facility/Permittee Name: _____

Tier I Operating Permit No.: _____

Facility Location: _____

Issuance Date: _____

AIRS Facility No.: _____

Compliance Reporting Period: _____

1 Permit Condition	2 Condition Title / Description	3 Comments

INSTRUCTIONS FOR TIER I SEMIANNUAL MONITORING TABLE

FORM AQ-C5

Column 1: Permit Condition Number

Enter the number of each permit condition or term that addresses monitoring, exactly as it appears in the Tier I permit.

Column 2: Permit Condition Title or Description

Enter the permit condition title or a brief summary to describe the requirement(s) of the permit condition.

Column 3: Comments

Describe the monitoring that was conducted during the reporting period.

- Monitoring includes any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. For example, this would include fuel use or process rate monitoring, fuel analyses, operational or control device parameter monitoring (e.g., pressure drop), hours of operation, etc.
- Monitoring includes conditions for testing and the recordkeeping associated with that testing.
- Information may also be provided for any other material information which will be used to determine compliance status in the Annual Compliance Certification (i.e., information beyond required monitoring which may potentially affect the compliance status).
- Note that each instance where monitoring was not performed as specified in the permit is a deviation. This must be entered into the Semiannual Deviation Summary Table (Form AQ-C3) if not previously reported.
- If the monitoring required by the condition in Column 1 was impacted by any permit deviations that occurred during the semiannual reporting period (if any), briefly describe this impact in Column 3. Consider deviations reported on the Deviation Summary Table (Form AQ-C3) as well as other deviations that were reported promptly at an earlier date (e.g., excess emissions events, NSPS report per 40 CFR 60.7(c), etc.).

TIER I SEMIANNUAL DEVIATION SUMMARY TABLE

FORM AQ-C3

Facility/Permittee Name: _____

Tier I Operating Permit No.: _____

Facility Location: _____

Issuance Date: _____

AIRS Facility No.: _____

Compliance Reporting Period: _____

1 No.	2 Permit Condition	3 Emissions Unit	4 Deviation	5 Time Began		6 Time Ended		7 Date DEQ Notified	8 Cause	9 Corrective Action & Preventative Measures	10 Attachment
				Date	Hour	Date	Hour				
1											
2											
3											
4											
5											
6											
7											
8											

INSTRUCTIONS FOR TIER I SEMIANNUAL DEVIATION SUMMARY TABLE

FORM AQ-C3

The purpose of the Semiannual Deviation Summary Table (Form AQ-C3) is to provide information required by IDAPA 58.01.01.322.08. Each and every permit condition is subject to prompt deviation reporting. Deviation reports are due at least every six months unless the permit specifies another time frame. All instances of deviations from permit requirements must be clearly identified in the report. Deviations attributable to excess emissions must be reported in accordance with IDAPA 58.01.01.130-136 and, therefore, are not required to be addressed on this form.

Column 1: No.

Each deviation is assigned a number for tracking purposes.

Column 2: Permit Condition Number

Enter the number of the permit condition for which the deviation occurred exactly as it appears in the applicable permit.

Column 3: Emissions Unit(s)

Enter the name of the emissions unit(s) for which the deviation occurred. If the deviation applied to the entire facility, enter "facility-wide."

Column 4: Deviation

Enter a description of the deviation and quantify it where practical (e.g., the actual fuel oil firing rate was 12 gal/hr). All instances of deviations from the Tier I operating permit requirements must be clearly identified. Deviation means any situation in which an emissions unit fails to meet a permit term or condition. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in the Tier I operating permit. For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

- (1) A situation where emissions exceed an emissions limitation or standard.
- (2) A situation where process or emissions control device parameter values indicate that an emissions limitation or standard has not been met.
- (3) A situation in which observations or data collected demonstrates noncompliance with an emissions limitation or standard or any work practice or operating condition required by the permit.
- (4) A situation where required monitoring, recordkeeping, and/or reporting are not done, or the frequency specified in the permit is not met.
- (5) A situation in which an exceedance or an excursion occurs, as defined in 40 CFR 64, *Compliance Assurance Monitoring* (CAM Rule).
(This only applies if the emissions unit is subject to CAM.)

Columns 5 and 6: Time Began and Time Ended

Enter the date and time when the deviation began and when it ended.

Column 7: Date DEQ Notified

Enter the date DEQ was notified of the deviation. Enter the actual date reported if the deviation is subject to an applicable requirement which defines the term "prompt" or otherwise specifies a time frame for reporting deviations. For other deviations not previously reported, the date may be entered as "This Report."

Column 8: Cause

Enter the cause or causes of the deviation.

Column 9: Corrective Actions and/or Preventative Measures

Identify any corrective actions and/or preventative measures taken to correct the deviation and/or prevent a recurrence. If the deviation concerns a monitoring requirement in the permit, describe any alternative monitoring conducted or other credible evidence that is available to determine compliance. The term credible evidence means any reliable evidence beyond that generated from required monitoring that could be used to determine compliance.

Column 10: Attachment

Indicate if additional information is attached to aid the compliance determination. If multiple attachments are included, label each attachment as it applies to the respective permit condition. In Column 10 of Form AQ-C3, provide an identifier (A, 1, or similar) that clearly links the attachment to the permit condition. The attachment should also contain the unique identifier and the name or label of the attachment as it applies to the permit condition. Clearly indicate how the attachment applies to Columns 4, 5, 6, 7, and 9 of Form AQ-C3.